

EXHIBIT 22

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

STATE OF MARYLAND; STATE OF
DELAWARE; STATE OF CALIFORNIA; STATE
OF COLORADO; STATE OF ARIZONA; STATE
OF CONNECTICUT; DISTRICT OF COLUMBIA,
STATE OF HAWAI'I; STATE OF ILLINOIS;
OFFICE OF THE GOVERNOR *ex rel.* Andy
Beshear, in his official capacity as Governor of the
COMMONWEALTH OF KENTUCKY; STATE OF
MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE OF
MICHIGAN; STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE OF
NEW MEXICO; STATE OF NEW YORK; STATE
OF NORTH CAROLINA; STATE OF OREGON;
JOSH SHAPIRO, in his official capacity as
Governor of the COMMONWEALTH OF
PENNSYLVANIA; STATE OF RHODE ISLAND;
STATE OF VERMONT; STATE OF
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as
AmeriCorps; and JENNIFER BASTRESS
TAHMASEBI, in her official capacity as Interim
Head of the Corporation for National and
Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

DECLARATION OF LUKE SHORTY

Pursuant to 28 U.S.C. § 1746, I, Luke Shorty, hereby declare as follows:

1. I am a resident of the State of Maine. I am over the age of 18 and have personal knowledge of all the facts stated herein, including as based on my experience and information provided to me. If called as a witness, I could and would testify competently to the matters set forth below.

2. I currently serve as the Board Chair of the Maine Commission for Community Service, alternatively known as Volunteer Maine (hereinafter “the Commission”).

3. The Commission is responsible for managing the Funds received from AmeriCorps the Federal Agency.

4. In my role as Board Chair of the Commission, I have accountability for oversight of the Federal Grants received from AmeriCorps the Federal Agency.

5. The Commission was established to strengthen Maine communities by building capacity and sustainability in Maine's volunteer and service communities through funding programs, providing training and technical assistance to local service programs, and advocating for service as a strategy to address community issues. The Commission board members assess grant requests, review performance, and monitor implementation of strategies to fulfill their statutory duties.

6. **Grant Receipts and Reviews:** The Commission receives and manages Prime Grants from AmeriCorps, awards and disburses subgrants from the Primes, monitors subgrantees for performance and compliance with grant requirements, provides training and technical assistance for subgrantees, coordinates participant recruitment, and advocates for AmeriCorps policies and processes that promote efficient and compliant use of federal resources. The Commission manages two separate types of grants involving federal AmeriCorps discretionary funds and nondiscretionary funds. First is competitive funding. In this process the Commission

issues Requests for Applications (RFA) that are based on federal Notices of Funding Opportunity (NOFO) issued by AmeriCorps. Grant applicants submit application materials in response to the RFA, the Commission assesses the applications using federal criteria, identifies proposals likely to be accepted in the national competition, submits the Maine proposals to AmeriCorps, and AmeriCorps exercises its discretion in approving grant applications. Second is formula funding. In this process the Commission receives Congressionally appropriated money from AmeriCorps and selects the subgrantees for this money using a competitive process that incorporates the criteria in 45 CFR Chapter XXV.

7. Currently, the Commission manages grants for 8 subgrantees, including the Maine Conservation Corps, Alpha Legal Foundation, Main Street Skowhegan, White Pine Programs, Greater Portland Council of Governments, Food for All, and Hospice Volunteers of Somerset County. Three subgrantees have planning grants through which they are engaging community residents and partners in design of an AmeriCorps program that will tackle a local need. The remaining subgrantees use the funds they receive from the Commission to operate programs to benefit Mainers. The money is used to recruit, manage, pay, and train AmeriCorps members and handle program operations and costs, monitor and support host sites to ensure compliant and effective service. Most subgrantees then post AmeriCorps members at partner organizations called host sites. The host sites typically provide a home base for members to deliver a service to residents, supervise regular service, and verify hours and performance measures.

8. The State of Maine Department of Agriculture Conservation and Forestry sponsors the AmeriCorps VISTA Ending Hunger Corps and the Commission's subgrantee, the Maine Conservation Corps. These programs have 125 AmeriCorps and AmeriCorps VISTA

members serving in schools, nonprofits, and public agencies to address health, economic mobility, food security, conservation, and nature-based economies.

9. **Educational and Long-Term Benefits:** In addition to immediate community support, AmeriCorps members earn the Segal AmeriCorps Education Award upon successfully completing their service, which has historically supported the educational pursuits of thousands of Mainers. Since 1994, over 7,800 residents have contributed nearly 11 million hours of service and earned awards totaling more than \$ 27.4 million. Higher education institutions and other organizations including student loan holders in Maine, have received more than \$9.2 million in education award payments since 1994.

10. **FY24 Performance Snapshot:** The following table summarizes the performance of various AmeriCorps programs in Federal FY24, which underscores the scale and impact of these community service efforts:

Program	Projects	Service Locations	Completed Participants	Education Awards	Federal Funding
AmeriCorps National	10	39	70	\$313,132	\$1,191,531
AmeriCorps NCCC	1	1	11	\$0	\$0
AmeriCorps State	5	61	107	\$370,345	1,559,800
AmeriCorps VISTA	6	27	30	213,350	761,576
AmeriCorps Seniors Foster Grandparents	2	63	120	N/A	1,128,934
AmeriCorps Seniors RSVP	5	68	1,854	N/A	426,734
AmeriCorps Seniors Senior Companion	2	13	68	N/A	518,744
AmeriCorps State Planning Grant	3	—	—	—	178,314
State Commission Operations Support	1	—	—	—	577,347

11. On Friday, April 25, 2025 at 6:57 p.m. the Commission received an email from the Interim Agency Head for AmeriCorps stating: “Effective immediately, the AmeriCorps award subrecipient(s) included in the attached spreadsheet is/are being terminated per 2 CFR 200.340(a)(4) because it has been determined that the award no longer effectuates agency priorities. You must immediately cease all award activities. This is a final agency action and is not administratively appealable.”

12. The impacted subrecipients and the amounts of the awards remaining as of April 25th are:

Main Street Skowhegan	\$194,305
White Pine Programs	\$83,135
Alpha Legal Foundation	\$81,000
Maine Conservation Corps.	\$1,131,911
Greater Portland Council of Governments	\$300,000
Democracy Maine	\$55,379
Food for All	\$59,966
Hospice Volunteers of Somerset County	\$53,764

13. **Impact of Grant Cancellations:** More than 100 Maine communities receive assistance from Commission-funded AmeriCorps programs. The programs help those communities tackle local issues related to chronic disease prevention, workforce development, nature-based economies, public land conservation and protection, education, and community resilience. They also engaged more than 1,000 residents of those communities as volunteers. The 120 AmeriCorps members in these programs generally devote 1700 hours to service but, as a result of this action, will serve only 30% of their term and have their education award reduced by

70%. The educational award can be used for educational debt repayment or further training and education. They also will not get the professional development that goes with service and increases their post-service employment prospects.

14. **Anticipated Impact for FY25 Due to Loss of Federal Agency Staff:** The imminent reduction—up to 90%—of the AmeriCorps Agency staff is anticipated to have profound and deleterious effects, including:

15. **Delayed Grant Reviews:** A drastic reduction in staffing will directly impair AmeriCorps' capacity to review and process grant applications in a timely manner. Given the rigorous processes required to ensure compliance and quality, delays in grant reviews will likely cascade, affecting subsequent funding decisions.

16. **Program Award Disruptions:** Timely grant review is integral to awarding funds and ensuring programs have the necessary resources to launch. Any delays in this process could shift the start dates of federally funded programs, jeopardizing the execution of projects slated for a Fall 2025 commencement.

17. **Community and Member Impact:** AmeriCorps programs are vital lifelines for communities across Maine, particularly in rural locations. Postponing the start of these programs would not only disrupt services to schools, food banks, shelters, and other critical community outlets, but it would also adversely affect the AmeriCorps members and seniors who rely on timely engagement and support. The ripple effect of these delays could undermine community resilience and erode the trust and benefits built over years of service collaboration.

18. The reduction in AmeriCorps the Federal Agency staffing presents a serious threat to the operational integrity and timely execution of FY25 funding initiatives. The potential delays in grant reviews and program awards could have a devastating impact on Maine's

communities and the individuals dedicated to service. The Commission stands ready to work collaboratively with federal and state partners to mitigate these risks and safeguard the continued success and outreach of the AmeriCorps program.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Dated: May 5, 2025

 /s/ Luke Shorty
Luke Shorty

